## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	CAUSE 4:20-CR-412-01
versus	§	
	§	JUDGE KEITH ELLISON
IBRAHEEM AL-BAYATI	§	

#### **UNOPPOSED MOTION TO CONTINUE**

#### TO THE HONORABLE KEITH ELLISON:

Ibraheem Al-Bayati asks the court to continue this case, and shows the following in support of this request:

- 1. Al-Bayati is charged with making a threat. A pretrial conference is scheduled for May 28, 2021, at 10:30 am, and his trial is scheduled for June 7 at 9:00 am.
- 2. Defense counsel needs additional time to review the discovery materials, to interview witnesses, and to discuss the evidence and sentencing guidelines with Al-Bayati. Counsel will be unable to provide effective assistance of counsel if the case proceeds to trial as currently scheduled.
- 3. Al-Bayati asks the trial be continued for at least 90 days.
- 4. The Assistant U.S. Attorney is unopposed to this motion.

Respectfully submitted,

/s/ David Adler

David Adler State Bar of Texas 00923150 Southern District of Texas 17942 6750 West Loop South Suite 120 Bellaire (Houston), Texas 77401 (713) 666-7576

(713) 665-7070 (Fax)

Attorney for Defendant, Ibraheem Al-Bayati

### CERTIFICATE OF SERVICE

This	motion	was	provided to	the	<b>AUSA</b>	on May	3.	2021.
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/s/ David Adler

David Adler

## CERTIFICATE OF CONFERENCE

The AUSA advised he is unopposed to this motion.

/s/ David Adler

David Adler

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UNITED STATES OF AMERICA	§	CAUSE 4:20-CR-412-01 JUDGE KEITH ELLISON		
versus	§ § §			
IBRAHEEM AL-BAYATI	§ §			
ORDER ON UNO	PPOSED MOT	ION TO CONTINUE		
Al-Bayati's unopposed motion t	o continue is:			
	Granted.			
Motions will be filed by	, 2021.			
Responses will be filed by	, 2021.			
A pretrial conference will be held on		, 2021, at	am pm	
The trial will begin on	, 2021, at	am pm.		
	Denied.			
Signed on May, 2021.				
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